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May 1, 2020

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**VIA ECF**

Chief Magistrate Judge Roanne L. Mann  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Mason v. Lumber Liquidators, Inc.*, Case No. 17-CV-4780 (MKB) (RLM)**

Dear Chief Magistrate Judge Mann:

This office represents Defendant Lumber Liquidators, Inc. (“Defendant”) in the above-referenced matter.

On January 21, 2020, the Court so-ordered the Parties’ Agreement Concerning Scope of Collective Discovery (the “Agreement”). (*See* Dkt. 182). The Agreement contained numerous deadlines. One such deadline is referenced in section IV(b), which states that, “Defendant shall be permitted to take the depositions of the five Named Plaintiffs Ashleigh Mason, Dan Morse, Ryan Carroll, Osagie Ehigie, and Travis Streeter in New York City on or before May 1, 2020.”

Because of the COVID-19 pandemic and the resulting travel restrictions, health concerns, impact on business operations, and cautionary quarantine of counsel for both sides, Defendant respectfully requests – with Plaintiffs’ consent – that the Named Plaintiffs’ depositions deadline of May 1, 2020 be temporarily extended *sine die*.

Per the Court’s January 21st order, the Parties will submit a joint status report on June 18, 2020. In that status report, the Parties will also address the deadline for the Named Plaintiffs’ depositions, as well as other deadlines referenced in the Agreement. As the Court may recall, the Agreement envisioned significant travel: 50+ depositions to be held throughout the country. Based on COVID-19, the foregoing has not been possible. In the June 18, 2020 status conference, the Parties will respectfully propose formal amended deadlines that take into account the impact and effect of COVID-19 on the Agreement, including the date by which all Named Plaintiffs’ depositions shall be completed.

We thank Your Honor for your attention and consideration in this matter.

Respectfully submitted,

The Honorable Chief Magistrate Judge Mann  
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Cc: All Counsel of Record